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Robert Pooler
Standards Division, National Organic Program
USDA-AMS-NOP
1400 Independence Ave. SW
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

December 17, 2019

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Re: AMS-NOP-19-0023, NOP-19-01
Proposed Amendments to the National List of Allowed and Prohibited Substances per October 2018 NOSB Recommendations (Crops and Handling) - Blood Meal-made with sodium citrate.

Dear Mr. Pooler,

Thank you for the opportunity to provide comments regarding the Proposed Amendments to the National List of Allowed and Prohibited Substances per October 2018 NOSB Recommendations (Crops and Handling). The Accredited Certifiers Association, Inc. (ACA) is a 501(c)(3) non-profit educational organization created to benefit the organic certifier community and the organic industry. The ACA strives for consistency in organic certification to uphold organic integrity, maintain stakeholder trust, and grow the organic industry. We are committed to being a positive influence for the good of the organic community. Our organization is made up of 61 certifying agencies worldwide and includes 46 of the 47 accredited certifiers headquartered in the United States. We are the frontline decision-makers for the National Organic Program (NOP).

The proposed rule includes the addition of “Blood meal-made with sodium citrate” to §205.601 of the National List of Allowed and Prohibited Substances (National List). The Accredited Certifiers Association Materials Working Group (Working Group) does not support the addition of blood meal - made with sodium citrate to the National List. The Working Group agrees that blood meal produced using methods that employ sodium citrate as an anticoagulant should continue to be permitted for use in organic agriculture. However, we disagree that blood meal made with sodium citrate is a synthetic substance necessitating listing at 7 CFR 205.601. Anticoagulants used in the production of blood meal, including sodium citrate, function only as processing aids during the extraction of red blood cells from whole blood, and the Working Group does not evaluate these as ingredients in the final blood meal product because the anticoagulant provides no technical function in the final blood meal product. Sodium citrate is

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used to prevent coagulation of blood during processing, but coagulation is not a concern in dried blood meal used for soil fertility. Such materials are considered to be a part of the standard of identity of the material, which is why blood meal has always been considered an allowed nonsynthetic for use in crop production. This is in contrast to acid stabilized liquid fish products, as the synthetic acid in these products has a functional effect in the final product (i.e. lowering pH and stabilization).

Listing blood meal processed with sodium citrate as a synthetic is not in line with NOP Guidance on Classification of Materials (Guidance 5033). Section 4.6 states:

> "For purposes of classification of a material as synthetic or nonsynthetic, a material may be classified as nonsynthetic (natural) if the extraction or separation technique results in a material that meets all of the following criteria:
>
> • At the end of the extraction process, the material has not been transformed into a different substance via chemical change;
> • The material has not been altered into a form that does not occur in nature; and
> • Any synthetic materials used to separate, isolate, or extract the substance have been removed from the final substance (e.g., via evaporation, distillation, precipitation, or other means) such that they have no technical or functional effect in the final product."

Blood meal used for fertility is separated from whole blood. Processing whole blood into blood meal for fertility is comparable to filtration; it does not transform the blood into a different substance via chemical change, it only acts to remove the calcium by binding. The blood meal is not altered into a form that does not occur in nature, and any anticoagulants used during processing, including sodium citrate, ultimately have no technical or functional effect in the final product, as discussed above. Therefore, blood meal processing with sodium citrate may still be classified as nonsynthetic.

In addition, listing blood meal processed with sodium citrate as a synthetic is not in line with NOP Guidance on Materials for Organic Crop Production (Guidance 5034-1). This guidance states that that blood meal is nonsynthetic and does not call out any additional required verification.

The 2017 technical report on Sodium Citrate, in the diagram at line 231, lists synthetic coagulants used during the production of blood meal, including not just sodium citrate but also EDTA and heparin. The addition of blood meal made with sodium citrate to the National List may unintentionally lead to the prohibition of blood meal produced with these other synthetic anticoagulants because they are not specifically listed as allowed at §205.601 for this use.

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Furthermore, this addition to the National List sets precedent for the review of processing aids in crop production materials that have no technical or functional effect in the final product. This may compel certifiers to review processing aids used during the production of other crop inputs that have been traditionally considered allowed nonsynthetic substances, such as bone and feather meal. Any of these products found to be produced with synthetic processing aids may be prohibited, because it is not included on the National List.

Finally, the addition of this listing to the National List will create significant workload for certifiers and material review organizations, who now need to re-review all blood meal fertility products that were previously allowed as nonsynthetic substances without review. Four certifiers and one material review organization will have to re-review at least 200 materials if "blood meal - made with sodium citrate" is added to the National List.

The ACA does not support the addition of blood meal - made with sodium citrate to the National List. The Working Group encourages the NOP to consider sodium citrate to be included in the standard of identity of blood meal and to allow this processing aid without listing it at §205.601 for this use. The ACA appreciates the opportunity to provide comments and thanks the National Organic Program for their careful consideration.

Sincerely,

Jennifer L Berkebile

Jennifer Berkebile
ACA Materials Working Group Facilitator